

## UNITED STATES DISTRICT COURT

for the

District of Nebraska

**SEALED**

United States of America  
v.  
JOHN DOE using the name R.C.

Case No. 8:19MJ315

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 24, 2018 in the county of Dodge in the  
       District of Nebraska, the defendant(s) violated:

*Code Section**Offense Description*

Title 18 United States Code,  
Section 1546(a)

fraudulent identification documents to satisfy the requirements of form I-9 to  
obtain employment

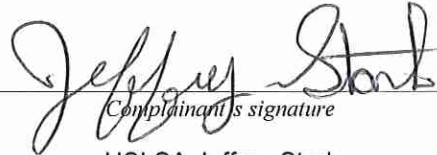
Title 42, United States Code,  
Section 408(a)(7)(B)

false representation of a Social Security number

This criminal complaint is based on these facts:

Affidavit

☒ Continued on the attached sheet.


*Complainant's signature*

HSI SA Jeffrey Stork

*Printed name and title*
☐ Sworn to before me and signed in my presence.

☒ Sworn to before me by telephone or other reliable  
electronic means.
Date: 7/19/2019City and state: Omaha, Nebraska

*Judge's signature*

Michael D. Nelson, U.S. Magistrate Judge

*Printed name and title*

UNITED STATE OF AMERICA)  
DISTRICT OF NEBRASKA )

AFFIDAVIT OF JEFFREY STORK

Your Affiant, Jeffrey Stork, being duly sworn, does depose and state:

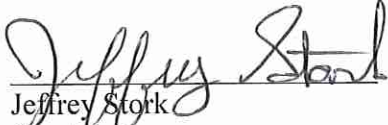
1. I, Jeffrey Stork, am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (hereinafter "HSI"). I have been employed with this agency since January 2003. HSI agents are authorized to investigate violations found in Title 8, 18, 19 (Customs), and Title 42 of the United States Code.
2. I am aware of the information set forth below through personal investigation, as well as, discussions with other HSI investigators, the Nebraska Department of Motor Vehicles (DMV), and personnel with Structural Component Systems.
3. On August 3, 2016, an individual residing in El Paso, TX, with the initials R.C. completed an Identity Theft/Criminal Impersonation report with the Nebraska DMV. The individual with the initials R.C. said that when moving between residences, he lost his birth certificate and social security card. The Nebraska DMV obtained a copy of the State of Texas Driver's License for the individual with initials R.C., number XXXXX547.

4. On June 27, 2019, your affiant reviewed form I-9, Employment Eligibility Verification, which was completed for employment at Structural Component Systems, in Fremont, NE. Immigration and Nationality Act section 274A(b) refers to the Employment Verification System, and requires an employer to verify that an individual seeking employment is not an unauthorized alien by examining certain identification documents provided by the individual seeking employment. The documents provided by the individual seeking employment are recorded on the I-9. The I-9 was filled out in the name of R.C., signed and dated on September 24, 2018. On the I-9, John DOE attested that he was a citizen or national of the United States by checking the appropriate box on the form. John DOE presented a Social Security card, bearing the number xxx-xx-9976, and bearing the name with the initials R.C. John DOE also presented a State of California Identification Card, bearing number Bxxxx767, with the name of R.C.
5. Your affiant performed a query of the State of California Identification card, number Bxxxx767 through the National Law Enforcement Telecommunications System. The query found no record for number Bxxxx767 with the name R.C.
6. Your Affiant verified with the Social Security Administration the Social Security number xxx-xx-9976 is registered to an individual with a name carrying the initials R.C.

7. Your Affiant reviewed the photographs provided by the State of Texas of the individual with the initials R.C. to the photograph of the individual with the initials R.C. on the State of California Identification Card provided to Structural Component Systems. The photographs do not appear to be the same individual.
8. On July 3, 2019, your affiant spoke via telephone with the individual R.C. in El Paso, TX. R.C. confirmed his social security number is XXX-XX-9976. R.C. stated that he filed an identity theft report with the Nebraska DMV because of issue with his credit report and difficulty renewing his State of Texas Driver's License. R.C. said that he has never lived or worked in the State of Nebraska, and he has never given anyone permission to use his name or social security number.
9. It has been your Affiant's prior investigative experience that undocumented alien employees at similar businesses procure false identification documents to falsely claim U.S. Citizenship in order to gain employment in the United States.
10. Based on these facts, your Affiant has reason to believe the John DOE, using the name R.C., presented fraudulent identification documents to satisfy the requirements of form I-9 to obtain employment in violation of Title 18, United States Code, Section 1546(a), fraud and misuse of visas, permits, and other documents. Further your affiant has reason to believe that John DOE falsely

represented a Social Security number to be his, in violation of Title 42, United States Code, Section 408(a)(7)(B).

I declare under the penalty of perjury that the foregoing facts and circumstances are true and correct to the best of my knowledge and belief.

  
Jeffrey Stork  
Special Agent  
Homeland Security Investigations

Sworn to before me by reliable electronic means:

Date: 07/19/2019

City and State: Omaha, Nebraska



Michael D. Nelson, U.S. Magistrate Judge  
United States District Court